IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CAO GROUP, INC.

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, and UNINCORPORATED ASSOCIATES IDENTIFIED ON SCHEDULE "A,"

Defendants.

Case No. 1:24-cv-1211

Judge Thomas M. Durkin

Magistrate Judge Jeannice W. Appenteng

JURY TRIAL DEMANDED

DEFENDANT'S MOTION TO DISMISS

Defendant zhuhai jiashu dianzishangwu youxiangongsi, which does business as GD-Whitening, by and through its undersigned counsel, respectfully moves to dismiss the claims against GD-Whitening in Plaintiff's Amended Complaint for the reasons set forth in the supporting Memorandum filed concurrently with this Motion.

On May 9, counsel for GD-Whitening reached out to CAO's counsel to ask whether CAO opposed this motion and proposed a briefing schedule. GD-Whitening did not hear back before filing this motion by the deadline to answer the First Amended Complaint and assumes CAO opposes. Under GD-Whitening's proposal, CAO's opposition would be due on May 30, 2024, and GD-Whitening's reply on June 13, 2024

Dated: May 9, 2024 Respectfully submitted,

/s/ Dustin L. Taylor

Dustin Taylor, IL Bar No. 6328158 **HUSCH BLACKWELL LLP**

1801 Wewatta Street, Suite 1000

Denver, CO 80202 6318 Direct: 303-749-7247 Fax: 303-749-7272

Dustin.Taylor@huschblackwell.com

Dan Yao Yao Legal Group LLC 15 Canterbury Rd., Suite A3 Great Neck, NY 11021 dyao@yaolawoffice.com

Attorneys for Defendant zhuhai jiashu dianzishangwu youxiangongsi d/b/a GD-Whitening